

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JEFFREY DESKOVIC,

Plaintiff,

vs.

CITY OF PEEKSKILL, ET AL.,

Defendants.

No. CV-07-8150 (KMK) (GAY)

**MOTION TO ADMIT DAVID M.
DOLENDI *PRO HAC VICE***

LINDA MCGARR,

Plaintiff,

vs.

CITY OF PEEKSKILL, ET AL.,

Defendants.

No. CV-07-9488 (KMK) (GAY)

**MOTION TO ADMIT DAVID M.
DOLENDI *PRO HAC VICE***

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Jessika J. Moon, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant's Name: David M. Dolendi
Company Name: Sedgwick LLP
Address: One North Wacker Dr., Suite 4200
City/State/Zip: Chicago, IL 60606
Phone Number: (312) 641-9050
Fax Number: (312) 641-9530
Email Address: david.dolendi@sedgwicklaw.com

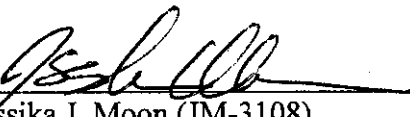
David M. Dolendi is a member in good standing of the bar of the State of Illinois. There are no pending disciplinary proceedings against Mr. Dolendi in any state or federal court.

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Dated: New York, New York
October 18, 2011

Respectfully submitted,

By: 
Jessica J. Moon (JM-3108)
SEDGWICK LLP
Attorneys for Third-Party Defendant
UNITED NATIONAL INSURANCE COMPANY
125 Broad Street, 39th Floor
New York, New York 10004-2400
(212) 422-0202 Telephone
(212) 422-0925 Facsimile
[Our file no. 04730-000006]

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JEFFREY DESKOVIC,

Plaintiff,

vs.

CITY OF PEEKSKILL, ET AL.,

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No. CV-07-8150 (KMK) (GAY)

**AFFIDAVIT OF JESSIKA J. MOON
IN SUPPORT OF MOTION TO
ADMIT DAVID M. DOLENDI *PRO*
*HAC VICE***

LINDA MCGARR,

Plaintiff,

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CITY OF PEEKSKILL, ET AL.,

Defendants.

No. CV-07-9488 (KMK) (GAY)

**AFFIDAVIT OF JESSIKA J. MOON
IN SUPPORT OF MOTION TO
ADMIT DAVID M. DOLENDI *PRO*
*HAC VICE***

State of New York)
 :ss
County of New York)

Jessika J. Moon, being duly sworn, hereby deposes and says as follows:

1. I am an attorney at Sedgwick LLP, counsel for Third-Party Defendant United National Insurance Company in the above-captioned actions. I am familiar with the proceedings in these cases. I make this statement based on my personal knowledge of the facts set forth herein and in support of United National Insurance Company's Motion to Admit David M.

Dolendi as counsel *pro hac vice* to represent United National Insurance Company in these matters.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 2000. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am a Member in Good Standing with this Court.

3. Mr. Dolendi is an attorney for Sedgwick LLP, and has worked at the firm since 2008.

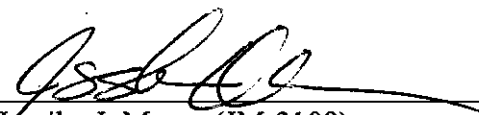
4. Mr. Dolendi is a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure. Mr. Dolendi is also currently a Member in Good Standing with the United States District Courts for the Northern District of Illinois and the Eastern District of Michigan.

5. Mr. Dolendi is a Member in Good Standing with the Bar of the State of Illinois. In accordance with Local Rule 1.3(c), a copy of a Certificate of Good Standing dated September 29, 2011 from the Illinois Supreme Court is attached hereto as Exhibit A.

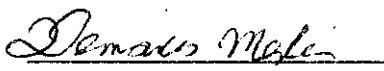
6. Accordingly, I am pleased to move the Court for admission of David M. Dolendi, Esq., *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of David M. Dolendi, Esq., *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit David M. Dolendi, Esq., *pro hac vice*, to represent Third-Party Defendant United National Insurance Company in the above-captioned matters be granted.


Jessica J. Moon (JM-3108)

Sworn to before me this
18 day of October, 2011


Notary Public

DEMARIS MEDINA
Notary Public, State of New York
No. 01MBS102857
Qualified in Bronx County
Commission Expires December 08, 2011

Certificate of Admission To the Bar of Illinois

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

David Michael Dolendi

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 7, 2002 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Thursday, September 29, 2011.

Carolyn Taft Grosboll

Clerk

CERTIFICATE OF SERVICE

I, JESSIKA J. MOON, hereby certify and affirm that a true and correct copy of the attached **NOTICE OF MOTION TO AND AFFIDAVIT IN SUPPORT OF MOTION TO ADMIT DAVID M. DOLENDI *PRO HAC VICE*** was served via regular mail on October 19, 2011, upon:

See attached service list

Dated: New York, New York
October 19, 2011



Jessica J. Moon

SERVICE LIST

Plaintiff Jeffrey Deskovic	Barry C. Scheck Cochran, Neufeld & Scheck, LLP 99 Hudson Street New York, NY 10013 (212) 965-9081 Fax: (212) 965-9084
Consolidated Plaintiff Linda McGarr	Eric J. Hecker Emery Celli Brinckerhoff & Abady, LLP 75 Rockefeller Plaza 20 th Floor New York, NY 10019 (212) 763-5000 Fax: (212) 763-5001
Movant M.D. Charles Catanese	Joseph F. Mahoney County Attorney, County of Orange, New York Law Dept., 255 Main Street Goshen, NY 10924 (845) 291-3150 Fax: (845) 291-3167 Email: jjmahoney@orangecountygov.com
Defendant City of Peekskill	William Gorman Passannante Anderson Kill & Olick, P.C. 1251 Avenue of the Americas New York, NY 10020 (212) 278-1000 Fax: (212) 278-1733 Email: wpassannante@andersonkill.com Peter Alexander Meisels Wilson Elser, Moskowitz Edelman & Dicker LLP (White Plains) 3 Gannett Drive White Plains, NY 10604 (914) 323-7000 Fax: (914) 323-7001 Email: peter.meisels@wilsonelser.com

Defendant Westchester County	Stuart Evan Kahan Oxman Tulis Kirpatrick Whyatt & Geiger, LLP 120 Bloomingdale Road White Plains, NY 10605 (914) 422-3900 Fax: (914) 422-3636 Email: skahan@oxmanlaw.com
Defendant David Levine	John Martin Flannery Wilson Elser Moskowitz Edelman & Dicker LLP (CT) 1010 Washington Blvd. Stamford, CT 06901 (914) 323-7000 Fax: (914) 323-7001 Email: john.flannery@wilsonelser.com
Defendant Eugene Tumolo	James Alfred Mitchell Stillman, Friedman & Shechtman, P.C. 425 Park Avenue New York, NY 10022 (212) 223-0200 Fax: (212) 223-1942 Email: jmitchell@stillmanfriedman.com
Defendant Louis Roh	Robert Meade Bleakley Platt & Schmidt, LLP One North Lexington Avenue White Plains, NY 10601 (914) 287-6112 Fax: (914) 683-6956 Email: remade@bplaw.com
Defendant New York State Department of Health	Kathryn Elena Leone Office of the Attorney General, New York State 120 Broadway New York, NY 10271 (212) 416-8661 Email: kathryn.leone@ag.ny.gov
Cross Claimant Daniel Stephens	James A. Randazzo Gelardi & Randazzo LLO 800 Westchester Ave., Suite S-608 Rye Brooke, NY 10573 (914) 328-5590 Fax: (914) 328-5591 jrandazzo@gandrlaw.com

Westport Insurance Company, as successor-in-interest to North River Insurance Company North River Insurance Company Westport Insurance Company, as a successor-in-interest to International Insurance Company	Darcy Ibach Lewis Brisbois Bisgaard & Smith LLP 550 West Adams Street Suite 300 Chicago, IL 60661 <u>dibach@lbbslaw.com</u> (312) 463-3339
TIG Insurance Company, as a successor-in-interest to International Insurance Company	TIG Insurance Co. 250 Commercial Street Suite 5000 Manchester, NH 03101-1116 (603) 656-2233
Underwriters at Lloyd's, London CX Reinsurance Company Limited, as successor-in-interest to CNA International Reinsurance Company CX Reinsurance Company Limited, as successor-in-interest to CNA Reinsurance of London, Limited Sphere Drake Insurance PLC United National Insurance Company	Patrick T. Walsh Jill A. Kaplan Hinkhouse Williams Walsh LLP 180 Stetson Avenue Suite 3400 Chicago, IL 60601 <u>pwalsh@hww-law.com</u> (312) 784-5412 <u>jkaplan@hww-law.com</u> (312) 784-5421
Illinois Union Insurance Company	ACE INA Ins. Co. of North America 436 Walnut Street Philadelphia, PA 19106-3703 (215) 640-1000
Travelers Indemnity Company as successor-in- interest to Gulf Insurance Company	Travelers Indemnity Co. One Tower Square Hartford, CT 06183 (860) 277-0111
American Motorists Insurance Company, as successor-in-interest to American Protection Insurance Company American Motorists Insurance Company, as successor-in-interest to Specialty National Insurance Company	Karen M. Dixon Meckler Bulger Tilson Marick & Pearson 123 N. Wacker Dr. Suite 1800 Chicago, IL 60606 <u>karen.dixon@mbtlaw.com</u> (312) 474-7900 (312) 474-7913 Fax (312) 474-7898

Harco National Insurance Company	Harco National Insurance Co. 702 Oberlin Road Raleigh, NC 27605
Illinois National Insurance Company	Illinois National Insurance Co. 300 South Riverside Plaza Suite 2100 Chicago, IL 60606-6613
Markel American Insurance Company	Steven J. Fried Clausen Miller PC One Chase Manhattan Plaza 39th Floor New York, NY 10005 sfried@clausen.com Tel: (212) 805-3920